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**BY ECF**

Hon. Eric R. Komitee  
Eastern District of New York  
United States Courthouse  
Room 6G North  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Rayne Valentine v. City of New York. – 21-cv-4867 (EK) (VMS)

Your Honor:

I am co-counsel for Mr. Rayne Valentine. Mr. Valentine has recently accepted an Offer of Judgment pursuant to Fed.R.Civ.P. 68 in this matter (*see* ECF 71) and filed a proposed Judgment (ECF 72).

I now write jointly with defense counsel to ask that the Court extend the deadline by which Plaintiff must file any application for attorney's fees, costs, and expenses until 60 days after the Court enters judgment in accordance with the Rule 68 Offer of Judgment. If the Court grants this application, the parties will use that time to exchange information, demands, and offers, and will attempt to settle Plaintiff's claim for attorney's fees, costs, and expenses without the need for intervention from the Court, if possible.

The parties thank Your Honor for the Court's attention to this matter.

Respectfully submitted,

Gideon Orion Oliver